

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

UNITED STATES OF AMERICA

v.

THOMAS JOHN BOUKAMP

No: 5:20-CR-165-H

**GOVERNMENT’S MOTION TO LIMIT DEFENDANT’S ACCESS TO
DISCOVERY**

The United States (“government”) requests the Court grant the government permission to limit the defendant’s access to discovery as follows:

The government will provide redacted copies of all reports and documents in discovery directly to the defendant. Additionally, the government will provide the defendant electronic copies of his interview with law enforcement, his jail calls that are included in the government’s discovery, any interviews or recorded conversations with adults, and the voluminous material from Google, Verizon, and T-Mobile, excluding identifying and contact information of the minor victim.

The government requests to restrict the defendant’s access to the forensic interviews of the victim (M.W.) and her minor sister (B.W.), photographs of M.W., the contents of and forensic extractions of any devices collected and examined, and contraband material including child pornography and child erotica. This material will be made available for the defendant’s review at the U.S. Attorney’s Office in Lubbock. The government will facilitate the defendant’s travel from the Lubbock County Detention Center to the U.S. Attorney’s Office to review this material. This material contains

personal identifying information of the victim and other minors and is material that the victim would likely not want the defendant to have in his possession. Title 18, United States Code, Section 3771 affords crime victims certain rights including “(1) The right to be reasonably protected from the accused” and “(8) The right to be treated with fairness and with respect for the victim’s dignity and privacy.” 18 U.S.C. § 3771(a). To protect the victim’s dignity and privacy, the government respectfully requests the Court permit the government to limit the defendant’s access to discovery in the manner stated above.

The government will meet with the defendant next week to discuss discovery and the availability of the restricted discovery. The government will file a Notice of Conference with the Court after its meeting with the defendant outlining the discussion with the defendant, the discovery that was provided to the defendant, and what discovery is available for his review at the U.S. Attorney’s Office and noting any objections or concerns he raised.

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

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CERTIFICATE OF CONFERENCE AND SERVICE

The United States did not confer with Boukamp as it is not required due to his *pro se* representation. Pursuant to Rule 49 of the Federal Rules of Criminal Procedure, the United States will immediately forward a copy of this motion and its' proposed order to Boukamp at the Lubbock County Detention Center.

s/ Callie Woolam
CALLIE WOOLAM
Assistant United States Attorney